



**Air Quality**  
**PERMIT TO CONSTRUCT**  
**State of Idaho**  
**Department of Environmental Quality**

**PERMIT No.:** P-2008.0131

**FACILITY ID No.:** 041-00014

**AQCR:** 61      **CLASS:** B      **ZONE:** 12

**SIC:** 3084      **NAICS:** 326122

**UTM COORDINATE (km):** 428.085, 4659.602

**1. PERMITTEE**

Freedom Plastics, Inc.

**2. PROJECT**

Initial PTC project – Permitting an existing PVC pipe and fitting manufacturing operation

**3. MAILING ADDRESS**

640 S. Hwy. 91

**CITY**

Preston

**STATE**

ID

**ZIP**

83263

**4. FACILITY CONTACT**

Jeannie Bell

**TITLE**

Environmental Manager

**TELEPHONE**

(208) 852-2000

**5. RESPONSIBLE OFFICIAL**

Scott Griffith

**TITLE**

Engineering/Maintenance Manager

**TELEPHONE**

(208) 852-2000

**6. EXACT PLANT LOCATION**

640 S. Hwy. 91, Preston, ID 83263

**COUNTY**

Franklin

**7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS**

PVC plastic pipe fittings manufacturing

**8. PERMIT AUTHORITY**

This permit is issued according to the Rules for the Control of Air Pollution in Idaho, IDAPA 58.01.01.200 through 228, and pertains only to emissions of air contaminants regulated by the state of Idaho and to the sources specifically allowed to be constructed or modified by this permit.

This permit (a) does not affect the title of the premises upon which the equipment is to be located; (b) does not release the permittee from any liability for any loss due to damage to person or property caused by, resulting from, or arising out of the design, installation, maintenance, or operation of the proposed equipment; (c) does not release the permittee from compliance with other applicable federal, state, tribal, or local laws, regulations, or ordinances; (d) in no manner implies or suggests that the Department of Environmental Quality (DEQ) or its officers, agents, or employees, assume any liability, directly or indirectly, for any loss due to damage to person or property caused by, resulting from, or arising out of design, installation, maintenance, or operation of the proposed equipment.

This permit will expire if construction has not begun within two years of its issue date or if construction is suspended for one year.

This permit has been granted on the basis of design information presented with its application. Changes in design, equipment or operations may be considered a modification. Modifications are subject to DEQ review in accordance with IDAPA 58.01.01.200 through 228 of the Rules for the Control of Air Pollution in Idaho.

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**DARRIN PAMPAIAN, PERMIT WRITER**  
**DEPARTMENT OF ENVIRONMENTAL QUALITY**

**DATE MODIFIED/REVISED:**

**DATE ISSUED:**

\_\_\_\_\_  
**MIKE SIMON, STATIONARY SOURCE PROGRAM MANAGER**  
**DEPARTMENT OF ENVIRONMENTAL QUALITY**

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## Acronyms, Units, and Chemical Nomenclature

AFS	AIRS Facility Subsystem
AIRS	Aerometric Information Retrieval System
AQCR	Air Quality Control Region
Btu	British thermal unit
CAA	Clean Air Act
CFR	Code of Federal Regulations
CO	carbon monoxide
DEQ	Department of Environmental Quality
dscf	dry standard cubic feet
EPA	U.S. Environmental Protection Agency
gpm	gallons per minute
gr	grain (1 lb = 7,000 grains)
HAPs	hazardous air pollutants
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometer
l/yr	liters per year
lb/hr	pound per hour
m	meter(s)
MACT	Maximum Achievable Control Technology
MMBtu	million British thermal units
NESHAP	Nation Emission Standards for Hazardous Air Pollutants
NO <sub>2</sub>	nitrogen dioxide
NO <sub>x</sub>	nitrogen oxides
NSPS	New Source Performance Standards
PM	particulate matter
PM <sub>10</sub>	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
ppm	parts per million
PSD	Prevention of Significant Deterioration
PTC	permit to construct
PTE	potential to emit
PVC	polyvinyl chloride
scf	standard cubic feet
SIC	Standard Industrial Classification
SIP	State Implementation Plan
SM	synthetic minor
SO <sub>2</sub>	sulfur dioxide
SO <sub>x</sub>	sulfur oxides
T/yr	tons per year
µg/m <sup>3</sup>	micrograms per cubic meter
UTM	Universal Transverse Mercator
VOC	volatile organic compound

# AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-2008.0131

<b>Permittee:</b>	Freedom Plastics, Inc.	<b>Facility ID No. 041-00014</b>
<b>Location:</b>	Preston, Idaho	

## 1. PERMIT TO CONSTRUCT SCOPE

### *Purpose*

- 1.1 The purpose for this memorandum is to satisfy the requirements of IDAPA 58.01.01.200, Rules for the Control of Air Pollution in Idaho, for issuing permits to construct.

### *Regulated Sources*

- 1.2 Table 1.1 lists all sources of regulated emissions in this PTC.

**Table 1.1 SUMMARY OF REGULATED SOURCES**

Permit Section	Source Description	Emissions Control(s)
2.	<u>GLYCOL TANK HEATER:</u> 01 - Natural gas-fired heater with a rated heat capacity of 1.85 MMBtu/hr	None
	<u>SQUARE HEATER:</u> 02 - Natural gas-fired heater with a rated heat capacity of 0.12 MMBtu/hr	None
	<u>WALL HEATER:</u> 03 - Natural gas-fired heater with a rated heat capacity of 0.03 MMBtu/hr	None
	<u>INFRARED HEATER:</u> 04 - Natural gas-fired heater with a rated heat capacity of 1.2 MMBtu/hr	None
	<u>FORCED AIR FURNACES:</u> 05 - Natural gas-fired heater with a rated heat capacity of 1.685 MMBtu/hr	None
3.	<u>GLUING STATION PROCESS:</u> Adhesives use - IPS Corp. Weld-On P-70 primer, IPS Corp. Weld-On 811 A-B epoxy, Arrow Adhesives AA-2304 contact cement, IPS Corp. 1969 green glue, Weld-On 711 white glue, Weld-On 711 grey glue, Weld-On 719 white glue, and Weld-On 719 grey glue	Annual Use limits

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**2. PVC PLASTIC PIPE HEATING OPERATION WITH A GLYCOL TANK HEATER AND SPACE HEATING WITH A SQUARE HEATER, A WALL HEATER, AN INFRARED HEATER, AND FORCED AIR FURNACES**

**2.1 Process Description**

Freedom Plastics uses standard length PVC plastic pipe as a raw material. The full lengths of pipe are cut into the required lengths on a saw. If a cut piece of pipe requires a drilled hole, it is taken to a router station for drilling. The cut pieces of pipe are then taken to the pulling station where they are placed on a heated pad and heated until they achieve the correct flexibility. At this time, a heated mandrel is placed inside the cut pieces of pipe to be pulled through the router hole.

The cut pieces of pipe are then placed in a glycol tank at the required depth and heated for the required amount of time according to the pipe thickness. After which they are moved to a bellling station and placed on a mandrel to make either a hub or a gasket end. When this process is finished, the cut pieces of pipe are taken to the trim-saw for any necessary trimming. If additional pieces of pipe need to be attached, the cut pieces of pipe are taken to the gluing station operation.

Although the cutting, drilling, and trimming processes release small amount of particulates into the air, these are captured by a filtration system within the building and not vented outside.

**2.2 Emissions Control Description**

**Table 2.1 GLYCOL TANK HEATER, SQUARE HEATER, WALL HEATER, IFRARED HEATER, AND FORCED AIR FURNACES DESCRIPTION**

<b>Emissions Unit/Process</b>	<b>Emissions Control Device</b>	<b>Emissions Point</b>
Glycol Tank Heater/01	N/A	Glycol
Square Heaters/02	N/A	Square
Wall Heaters/03	N/A	Wall
Infrared Heaters/04	N/A	Infrared
Forced Air Furnaces/05	N/A	Forced

***Emissions Limits***

**2.3 Opacity Limit**

Emissions from the glycol tank heater, square heaters, wall heaters, infrared heaters, and the forced air furnaces stack, or any other stack, vent, or functionally equivalent opening associated with the glycol tanks, square heaters, wall heaters, infrared heaters, and the forced air furnaces, shall not exceed 20% opacity for a period or periods aggregating more than three minutes in any 60-minute period as required by IDAPA 58.01.01.625. Opacity shall be determined by the procedures contained in IDAPA 58.01.01.625.

***Operating Requirements***

**2.4 Permitted Fuel**

The glycol tanks, square heaters, wall heaters, infrared heaters, and the forced air furnaces shall only combust natural gas as fuel.

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### **3. GLUING STATION PROCESS**

#### **3.1 Process Description**

To attach additional pieces of pipe to make a fitting the cut pieces of pipe are taken to the gluing station. Primer, epoxy, contact cement and other glues as listed in Table 3.1 are used to join the additional pieces of pipe in this operation. The finished plastic pipe fittings are then taken to the shipping area for quality assurance measurements. If a specific fitting requires a gasket, the gasket is glued in with contact cement prior to shipment.

#### **3.2 Emissions Control Description**

**Table 3.1 GLUING STATION PROCESS DESCRIPTION**

<b>Emissions Unit/Process</b>	<b>Emissions Control Device</b>	<b>Emissions Point</b>
IPS Corp. <i>Weld-On P-70</i> primer, IPS Corp. <i>Weld-On 811</i> A-B epoxy, Arrow Adhesives AA-2304 contact cement, IPS Corp. 1969 green glue, IPS Corp. <i>Weld-On 711</i> white glue, IPS Corp. <i>Weld-On 711</i> grey glue, IPS Corp. <i>Weld-On 719</i> white glue, and IPS Corp. <i>Weld-On 719</i> grey glue	Annual Limits on Material Usage	Fugitive

### ***Emissions Limits***

#### **3.3 VOC Emissions Limits**

The VOC emissions from the gluing station process shall not exceed 9.41 T/yr based upon primer, epoxy, contact cement, and glue use.

#### **3.4 Odors**

No person shall allow, suffer, cause, or permit the emission of odorous gases, liquids, or solids into the atmosphere in such quantities as to cause air pollution in accordance with IDAPA 58.01.01.776.01.

### ***Operating Requirements***

#### **3.5 Primer, Epoxy, Contact Cement, and Glue Use Limits**

The primer, epoxy, contact cement, and glue use in the gluing station process shall not exceed any of the following limits:

- 2,000 gal/yr of IPS Corp. *Weld-On P-70* primer, or
- 7.93 gal/yr (30 l/yr) of IPS Corp. *Weld-On 811* A-B epoxy, or
- 100 gal/yr of Arrow Adhesives AA-2304 contact cement, or
- 300 gal/yr of IPS Corp. 1969 green glue, or
- 150 gal/yr of IPS Corp. *Weld-On 711* white glue, or

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- 30 gal/yr of IPS Corp. *Weld-On 711* grey glue, or
- 1,500 gal/yr of IPS Corp. *Weld-On 719* white glue, or
- 200 gal/yr of IPS Corp. *Weld-On 719* grey glue.

### ***Monitoring and Recordkeeping Requirements***

#### **3.6 Material Purchase Records and Material Data Safety Sheets**

For each material used in the gluing station process, including but not limited to primer, epoxy, contact cement, and glue use, the permittee shall record and maintain the following records:

- Material purchase records
- Material Safety Data Sheets (MSDS)

#### **3.7 Material Usage Records**

The permittee shall monitor and record monthly, in gallons, the usage of all primer, epoxy, contact cement, and glue materials used in the gluing station process.

#### **3.8 VOC Emissions Monitoring Requirements**

Using the purchase records and MSDS required by Permit Condition 3.6 and the material usage records required by Permit Condition 3.7, the permittee shall monitor and record the monthly and annual VOC emissions in tons from the gluing station process in order to demonstrate compliance with Permit Condition 3.3. Annual emissions shall be determined by summing monthly emissions over each previous consecutive 12-month period.

#### **3.9 Recordkeeping**

The permittee shall comply with the recordkeeping requirements of General Provision 7.

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#### 4. PERMIT TO CONSTRUCT GENERAL PROVISIONS

##### ***General Compliance***

1. The permittee has a continuing duty to comply with all terms and conditions of this permit. All emissions authorized herein shall be consistent with the terms and conditions of this permit and the Rules for the Control of Air Pollution in Idaho. The emissions of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit and the Rules for the Control of Air Pollution in Idaho, and the Environmental Protection and Health Act, Idaho Code §39-101, et seq.  
[Idaho Code §39-101, et seq.]
2. The permittee shall at all times (except as provided in the Rules for the Control of Air Pollution in Idaho) maintain in good working order and operate as efficiently as practicable, all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable Idaho laws for the control of air pollution.  
[IDAPA 58.01.01.211, 5/1/94]
3. Nothing in this permit is intended to relieve or exempt the permittee from the responsibility to comply with all applicable local, state, or federal statutes, rules and regulations.  
[IDAPA 58.01.01.212.01, 5/1/94]

##### ***Inspection and Entry***

4. Upon presentation of credentials, the permittee shall allow DEQ or an authorized representative of DEQ to do the following:
  - a. Enter upon the permittee's premises where an emissions source is located or emissions related activity is conducted, or where records are kept under conditions of this permit;
  - b. Have access to and copy, at reasonable times, any records that are kept under the conditions of this permit;
  - c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
  - d. As authorized by the Idaho Environmental Protection and Health Act, sample or monitor, at reasonable times, substances or parameters for the purpose of determining or ensuring compliance with this permit or applicable requirements.

[Idaho Code §39-108]

##### ***Construction and Operation Notification***

5. The permittee shall furnish DEQ written notifications as follows in accordance with IDAPA 58.01.01.211:
  - a. A notification of the date of initiation of construction, within five working days after occurrence;
  - b. A notification of the date of any suspension of construction, if such suspension lasts for one year or more;



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- c. A notification of the anticipated date of initial start-up of the stationary source or facility not more than sixty days or less than thirty days prior to such date;
- d. A notification of the actual date of initial start-up of the stationary source or facility within fifteen days after such date; and
- e. A notification of the initial date of achieving the maximum production rate, within five working days after occurrence - production rate and date.

[IDAPA 58.01.01.211, 5/1/94]

### ***Performance Testing***

- 6. If performance testing (air emissions source test) is required by this permit, the permittee shall provide notice of intent to test to DEQ at least 15 days prior to the scheduled test date or shorter time period as approved by DEQ. DEQ may, at its option, have an observer present at any emissions tests conducted on a source. DEQ requests that such testing not be performed on weekends or state holidays.

All performance testing shall be conducted in accordance with the procedures in IDAPA 58.01.01.157. Without prior DEQ approval, any alternative testing is conducted solely at the permittee's risk. If the permittee fails to obtain prior written approval by DEQ for any testing deviations, DEQ may determine that the testing does not satisfy the testing requirements. Therefore, at least 30 days prior to conducting any performance test, the permittee is encouraged to submit a performance test protocol to DEQ for approval. The written protocol shall include a description of the test method(s) to be used, an explanation of any or unusual circumstances regarding the proposed test, and the proposed test schedule for conducting and reporting the test.

Within 30 days following the date in which a performance test required by this permit is concluded, the permittee shall submit to DEQ a performance test report. The written report shall include a description of the process, identification of the test method(s) used, equipment used, all process operating data collected during the test period, and test results, as well as raw test data and associated documentation, including any approved test protocol.

[IDAPA 58.01.01.157, 4/5/00]

### ***Monitoring and Recordkeeping***

- 7. The permittee shall maintain sufficient records to ensure compliance with all of the terms and conditions of this permit. Records of monitoring information shall include, but not be limited to the following: (a) the date, place, and times of sampling or measurements; (b) the date analyses were performed; (c) the company or entity that performed the analyses; (d) the analytical techniques or methods used; (e) the results of such analyses; and (f) the operating conditions existing at the time of sampling or measurement. All monitoring records and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Supporting information includes, but is not limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation and copies of all reports required by this permit. All records required to be maintained by this permit shall be made available in either hard copy or electronic format to DEQ representatives upon request.

[IDAPA 58.01.01.211, 5/1/94]

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### ***Excess Emissions***

8. The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130-136 for excess emissions due to startup, shutdown, scheduled maintenance, safety measures, upsets and breakdowns.

[IDAPA 58.01.01.130-136, 4/5/00]

### ***Certification***

9. All documents submitted to DEQ, including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certification shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete.

[IDAPA 58.01.01.123, 5/1/94]

### ***False Statements***

10. No person shall knowingly make any false statement, representation, or certification in any form, notice, or report required under this permit, or any applicable rule or order in force pursuant thereto.

[IDAPA 58.01.01.125, 3/23/98]

### ***Tampering***

11. No person shall knowingly render inaccurate any monitoring device or method required under this permit or any applicable rule or order in force pursuant thereto.

[IDAPA 58.01.01.126, 3/23/98]

### ***Transferability***

12. This permit is transferable in accordance with procedures listed in IDAPA 58.01.01.209.06.

[IDAPA 58.01.01.209.06, 4/11/06]

### ***Severability***

13. The provisions of this permit are severable, and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.

[IDAPA 58.01.01.322.15.h, 5/1/94; 40 CFR 70.6(a)(5)]